

GERALD E. BRUNN, SBN 107004  
DREXWELL M. JONES, SBN 221112  
LAW OFFICES OF BRUNN & FLYNN  
A Professional Corporation  
928 12th Street, Suite 200  
Modesto, CA 95354  
Telephone: (209) 521-2133  
Facsimile: (209) 521-7584

Attorneys for Respondent, TARA KRAUSE

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

MICHAEL KRAUSE,

Petitioner,

vs.

TARA KRAUSE,

Respondent.

Case No.: 1:21-cv-01706-JLT-SAB

**RESPONDENT'S MOTION TO FIX AWARD  
OF ATTORNEY'S FEES AND COSTS**

Action Filed: November 30, 2021

Trial date: November 3, 2022

Respondent, TARA KRAUSE, by and through her attorney, Drexwell M. Jones, hereby moves for an award of attorney's fees and costs pursuant to the Court's Findings and Recommendations Granting In Part Respondent's Motion for Sanctions filed March 16, 2023 (ECF No. 109), and Order Adopting Findings and Recommendations filed April 3, 2023 (ECF No. 114).

The Court's Findings and Recommendations Granting Respondent's Motion for Sanctions filed March 16, 2023, grants Respondent's Motion for Sanctions (ECF No. 79) as to fees and expenses incurred after the May 18, 2022, hearing, pursuant to 28 U.S.C. §1927.

The attached supporting declaration of Drexwell M. Jones shows that substantial time was required to represent Respondent from after the May 18, 2022, hearing through March 31, 2023.

The total amount of time billed from after the May 18, 2022 hearing through March 31, 2023, exclusive of discounts and time spent in the preparation of this motion, is:

Drexwell M. Jones, Esq.	\$55,960.00
Gerald E. Brunn, Esq.	\$ 170.00
Heather J. McCauley, Paralegal	\$ 5,670.00
Diane Porter, Paralegal	<u>\$ 1,015.00</u>
<b>TOTAL</b>	<b>\$62,815.00</b>

The total amount of costs incurred from May 18, 2022 through December 5, 2023, is \$2,297.25.

Based on the foregoing and the supporting declaration served and filed herewith, Respondent respectfully requests that the court award reasonable attorney's fees and costs in the sum of \$65,112.25, to be entered as part of the judgment in favor of Respondent, TARA KRAUSE.

Dated: April 14, 2023

LAW OFFICES OF BRUNN & FLYNN  
A Professional Corporation

By: 

DREXWELL M. JONES  
Attorneys for Respondent, TARA KRAUSE

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